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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ARCHWAY INSURANCE SERVICES, LLC;)
UNION ONE INSURANCE GROUP, LLC;) CASE NO. 2:11-CV-1173-JCM-CWH
NEVADA INVESTMENT PARTNERS, LLC;)
and TRINITY CAPITAL MANAGEMENT)
GROUP, LLC,)

Plaintiffs,)

v.)

JAMES HARRIS; HARRIS CONSULTING)
SERVICES, INC.; and GREGORY HARRIS,)

Defendants.)

JAMES HARRIS; HARRIS CONSULTING)
SERVICES, INC.; and GREGORY HARRIS,)

Counterclaimants,)

v.)

ARCHWAY INSURANCE SERVICES, LLC;)
UNION ONE INSURANCE GROUP, LLC;)
NEVADA INVESTMENT PARTNERS, LLC;)
and TRINITY CAPITAL MANAGEMENT)
GROUP, LLC; DOE INDIVIDUALS 1-10; and)
ROE ENTITIES 11-20,)

Counterdefendants)

**DEFENDANTS / COUNTERCLAIMANTS’
MOTION FOR EXTENSION OF TIME
(Second Request)**

1 Defendants / Counterclaimants James Harris, Greg Harris and Harris Consulting
2 Services, Inc. ("the Harrises"), through counsel, move to extend the dispositive motion deadline,
3 by two court days, from the current date of September 26, 2013 to **September 30, 2013**.

4 This motion is timely filed before expiration of the current deadline for filing dispositive
5 motions in this matter.

6 The reasons for requesting this extension is that, while Defendants / Counterclaimants
7 have largely drafted the motions, additional time is needed to finalize the affidavits and
8 declarations in support of the motions, to finalize communications with any such witnesses, to
9 review and determine the excerpts of recently-obtained deposition transcripts to be used, and to
10 address additional issues being raised by discovery motions and other pending matters. This
11 minor extension of time will allow for the claims to be properly addressed on the merits in
12 accordance with Rule 56, and otherwise, in accordance with the rules and procedures governing
13 this action.
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16 LOVATO LAW FIRM, P.C.

17 /s/ Mario Lovato
18 MARIO P. LOVATO
19 Nevada Bar No. 7427
20 Attorney for Defendants / Counterclaimants
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22 IT IS SO ORDERED.

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25 UNITED STATES MAGISTRATE JUDGE
26 DATED: September 27, 2013
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